

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

AMERICAN ASSOCIATION OF
COLLEGES FOR TEACHER
EDUCATION, *et al.*,

Plaintiffs,

v.

DENISE CARTER, *et al.*,

Defendants.

Civil Action No. 25-cv-00702

**DECLARATION OF CHERYL HOLCOMB-MCCOY, PH.D., IN SUPPORT OF
APPLICATION FOR TEMPORARY RESTRAINING ORDER / PRELIMINARY
INJUNCTION**

I, Cheryl Holcomb-McCoy, Ph.D., declare and state under penalty of perjury the following:

1. I am the Chief Executive Officer/President of American Association of Colleges for Teacher Education (“AACTE”), one of the plaintiffs in this case. I am also a Distinguished Professor of Education at American University.

2. I am over the age of 18, and I am competent in all respects to testify to the matters below. I understand that this Declaration is for use in connection with the above-captioned civil action, and I make this Declaration based upon my own personal knowledge and my review of the AACTE’s business records.

3. AACTE is a nonprofit association of educator preparation programs, composed of hundreds of public and private colleges and universities and nonprofit teaching organizations. AACTE’s member organizations prepare professional educators across the United States and its territories, encompassing teachers, counselors, PK-12 administrators, and college faculty. AACTE’s principal place of business is 1602 L St., NW, Suite 601, Washington, DC 20036.

4. AACTE's mission is to elevate education and educator preparation through research, professional practice, advocacy, and collaboration. The termination of the Teacher Quality Partnership Program ("TQP") grants, the Supporting Effective Educator Development Program ("SEED") grants, and the Teacher and School Leader Incentive Program ("TSL") grants directly threatens this mission. These grants fund initiatives that benefit PK-12 students and schools nationwide by supporting innovative approaches to educator preparation and professional development. Through their work, grantees produce evidence-based practices that lead to the preparation of highly qualified teachers, principals, and school-based educators. As the nation's largest organization dedicated to educator preparation, AACTE prioritizes ensuring that every child has access to credentialed, well-prepared educators. These grants are vital to that goal. AACTE plays a crucial role in amplifying their impact by sharing grantees' research, policy insights, and best practices with the broader education community through publications, convenings, annual meetings, and other resources. Preserving these funding sources is essential to sustaining and advancing the quality of educator preparation and, ultimately, student success.

5. AACTE has 54 member organizations nationwide which were awarded TQP, SEED, and TSL grants and have been and will continue to be substantially and irreparably harmed by the termination of these grants in February 2025.

6. AACTE has five member organizations which were awarded TQP, SEED, and TSL grants for programs in Maryland, which has resulted in a substantial loss of funds for teacher preparation programs in Maryland.

Pursuant to 28 U. S. C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 3 day of March, 2025

By: *Cheryl C. Holcomb-McCoy*
Cheryl Holcomb-McCoy, PhD